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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF LISA J.
CISNEROS IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION, PURSUANT TO LOCAL
RULE 79-5(d), TO SEAL PLAINTIFFS'
MOTION TO COMPEL**

1 I, Lisa J. Cisneros, declare:

2 I am an associate in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, a
3 member of the State Bar of California, and am admitted to practice before the United States
4 District Court for the Northern District of California. I am one of the counsel for Plaintiffs in this
5 action. I make this declaration based on my own personal knowledge. If called upon to testify, I
6 could and would testify competently to the truth of the matters stated herein.

7 1. The following exhibits to the Declaration of Lisa J. Cisneros In Support of
8 Plaintiffs' Memorandum of Law In Support of Application of the Per Se Standard have been
9 designated CONFIDENTIAL or CONFIDENTIAL-ATTORNEYS' EYES by Defendants:

10 2. **Exhibit 1:** December 7, 2013 deposition of Apple Chief Executive Officer Tim
11 Cook.

12 3. **Exhibit 2:** December 11, 2013 deposition of David Lewin.

13 4. **Exhibit 3:** December 7, 2013 deposition of Kevin Murphy.

14 5. **Exhibit 4:** December 7, 2013 deposition of Edward A. Snyder.

15 6. **Exhibit 5:** December 8, 2013 deposition of Eric L. Talley.

16 7. **Exhibit 6:** November 25, 2013 Expert Report of Kevin Murphy.

17 8. **Exhibit 7:** December 6, 2013 Expert Report of Edward Snyder.

18 9. **Exhibit 8:** November 25, 2013 Expert Report of Eric Talley.

19 10. **Exhibit 182:** Plaintiffs' Exhibit 182, GOOG-HIGH TECH-00008283-4.

20 11. **Exhibit 2924:** Plaintiffs' Exhibit 2924, 231APPLE123280

21 12. **Exhibit 2925:** Plaintiffs' Exhibit 2925, 231 APPLE124988-5030

22 13. **Exhibit 2926:** Plaintiffs' Exhibit 2923, GOOG-HIGH-TECH-00625224-26

23 14. **Exhibit 2927:** Plaintiffs' Exhibit 2927, GOOG-HIGH-TECH-0062531-34

24 15. **Exhibit 2928:** Plaintiffs' Exhibit 2928, GOOG-HIGH-TECH-00625464-73

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

3 Executed this 10th day of April, 2014, in San Francisco, California.

4 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

5
6 By: /s/ Lisa J. Cisneros
Lisa J. Cisneros